



October 22, 2003

Ms. Paula Bisson
US Environmental Protection Agency
75 Hawthorne Street, CMD-4-2
San Francisco, CA 94105

Subject: Notification Regarding Self-implementing Onsite Cleanup and Disposal of
Polychlorinated Biphenyl Remediation Waste Inside Building 84 in Investigation
Area D1, Eastern Early Transfer Parcel, Mare Island, Vallejo, California

Dear Ms. Bisson:

CH2M HILL prepared this letter in compliance with the Consent Agreement and Final Order (CA/FO) between United States Environmental Protection Agency (USEPA) and the United States Department of the Navy (Navy), with the City of Vallejo and Lennar Mare Island (LMI) as intervenors (USEPA et al. 2001). The CA/FO sets forth the polychlorinated biphenyl (PCB)-related requirements that must be met to satisfy the Toxic Substances Control Act (TSCA) for the Eastern Early Transfer Parcel of Mare Island. This letter is submitted in compliance with Paragraph 12 of the CA/FO.

Background

From visual site surveys, as well as from review of historical records, building closure reports, and databases of electrical equipment, the Navy identified PCB sites where PCB-containing equipment was located, where PCB spills were documented, or where contamination was suspected because of building history or visible stains (TtEMI 1998). Navy personnel from Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment (SSPORTS) conducted interim PCB assessments and performed cleanup actions (i.e., washing, scabbling) in accordance with Technical Work Documents (TWDs), where necessary. Following the SSPORTS interim PCB assessments and any necessary cleanup actions, Tetra Tech Environmental Management, Inc. (TtEMI) personnel collected confirmation samples either to confirm SSPORTS findings that no cleanup was necessary or to determine the effectiveness of the SSPORTS cleanup actions.

One PCB site at Building 84 (ground floor) is listed in the Consent Agreement signed April 16, 2001 between LMI, the City of Vallejo, and the State of California Environmental Protection Agency, Department of Toxic Substances Control (LMI et al. 2001); this site is identified as Building 84 Assessment Location (AL)#01. Building 84 is located in the residential land use area within Investigation Area (IA) D1 (LMI 2000). Figure 1 shows the locations of the PCB sites within IA D1. Building 84 was the marine prison built in 1890. This building is located west of Suisun Avenue and south of Mesa Road (Figure 1). Building 84 is currently vacant but is considered a high-occupancy site.

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The *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003) describes the process for site closure in accordance with the CA/FO and the TSCA regulations. In compliance with this process, Figure 2 provides a flowchart illustrating the PCB site closure process, with the path for Building 84 AL#01 highlighted.

In accordance with the provisions of TSCA, and as stated in 40 CFR 761.61(a)(3), Notification is required at least 30 days prior to the start of a cleanup action at a PCB site. The purpose of this letter is to provide this required Notification for site cleanup at Building 84 AL#01. The cleanup action for stain-specific locations on the first floor of Building 84 AL#01 will be in accordance with 40 CFR 761.61(a)—self-implementing, onsite cleanup and disposal of PCB remediation waste. This Notification includes the nature, location, and extent of PCB contamination; summary of previous sampling and cleanup actions; cleanup plan to address remaining PCB concentrations; and a certification that all sampling plans and sampling analysis procedures used to characterize this site are on file and available for USEPA inspection. The following sections provide the required information in each of these categories.

Nature of Contamination – 40 CFR 761.61(a)(3)(i)(A)

The source of PCB contamination inside Building 84 is unknown. There are no recorded oil spills or transformers associated with the interior of this building. Sampling of the building floor (concrete and asphalt media) was initiated because stains were evident during a Navy facility closure site inspection in 1995.

The maximum PCB concentrations detected in floor samples inside Building 84 were 23.5 milligrams per kilogram (mg/kg) and 11.3 micrograms per 100 square centimeters ($\mu\text{g}/100\text{ cm}^2$). PCBs have not been detected in soil samples collected under the asphalt floor at this site. Following previous cleanup actions, PCB contamination in the asphalt floor remains at Building 84 AL#01 with a maximum concentration of 3.77 mg/kg.

Sampling Procedures and Results – 40 CFR 761.61(a)(3)(i)(B)

Table 1 provides a summary of the previous sampling at Building 84 AL#01. This table includes the sample numbers, matrix, sample date, and total PCB concentrations (laboratory reporting limit when PCBs were not detected). All samples were analyzed for PCBs using USEPA Methods SW8080, SW8081, or SW8082. Figure 3 shows the previous sample locations and cleanup action areas at Building 84 AL#01.

As part of the interim assessment, SSPTS personnel collected 42 stain-specific solid and wipe samples from the floor of Building 84 in February 1995. PCBs were not detected in 33 of these samples at laboratory reporting limits of 10 $\mu\text{g}/100\text{ cm}^2$ for wipe samples and 2 mg/kg for solid samples. The other nine samples had PCB concentrations ranging from 0.113 mg/kg to 23.5 mg/kg in asphalt/concrete media and 11.3 $\mu\text{g}/100\text{ cm}^2$ in a wipe sample (SSPTS 1997a).

SSPTS issued TWD 95-0070 (SSPTS 1995) to wash a 31-inch by 33-inch stained area of the asphalt floor where the initial assessment sample result was 11.3 $\mu\text{g}/100\text{ cm}^2$. SSPTS

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personnel collected two asphalt verification samples from this area on January 7, 1997 after this cleanup action. These two samples had PCB concentrations of 5.7 mg/kg and 8.4 mg/kg.

SSPORTS issued TWD 97-1472 (SSPORTS 1997b) to scabble six areas of the Building 84 floor where the PCB concentrations detected in the interim assessment samples exceeded the screening levels of 1 mg/kg and 10 µg/100 cm². The interim assessment results for these six areas were: 1.11 mg/kg, 1.17 mg/kg, 1.37 mg/kg, 3.77 mg/kg, 11.3 µg/100 cm², and 23.5 mg/kg (SSPORTS 1997a). The work specified in this TWD was never performed. Instead, SSPORTS issued TWD 97-1472 Revision A (SSPORTS 1998a), which was amended to specify for cleanup actions in only the two areas that had PCB concentrations exceeding 10 mg/kg and 10 µg/100 cm². Therefore, four sample locations inside Building 84 with PCB concentrations greater than 1 mg/kg (1.11 mg/kg to 3.77 mg/kg) were not abated by the Navy.

TWD 97-1472 Revision A provided instruction to scabble a 10- by 10-foot section of the concrete floor to a depth of 0.25 inch where the initial assessment PCB concentration was 23.5 mg/kg and to remove a 10- by 10-foot section of the asphalt floor from the area initially abated by TWD 95-0070 (SSPORTS 1998a). The results of samples collected after these cleanup actions are unknown. However, SSPORTS issued TWD 97-1472 Revision B (SSPORTS 1998b) to remove additional concrete and asphalt from the same two floor areas as TWD 97-1472 Revision A. Following these cleanup actions, SSPORTS personnel collected nine verification samples, but these data were not located in the Navy files. SSPORTS Yard Route Slip does state, however, that "the final laboratory analysis were all non-detect" (SSPORTS 1999).

TtEMI personnel collected three concrete confirmation samples from the floor of Building 84 on December 10, 1998. One concrete sample was collected from the exposed surface within the western abated areas where the floor had been removed to a depth of approximately 6 inches below the original surface (TtEMI 1998). PCBs were detected in this sample at a concentration of 0.02J mg/kg (TtEMI 1998). The other two confirmation samples were collected from the exposed surface within the eastern abated area where the floor had been removed to approximately 4 and 6 inches below the original surface (TtEMI 1998). PCBs were not detected in these two samples at a concentration greater than the laboratory reporting limit (Table 1).

In accordance with the *Draft Polychlorinated Biphenyl Work Plan* (CH2M HILL 2002), CH2M HILL collected eight soil samples on June 25, 2002 at Building 84 AL#01 to replace the missing verification data following TWD 97-1472 Revision B. PCBs were not detected in these soil samples at a concentration greater than the laboratory reporting limit of 0.037 mg/kg (Table 1). Attachment A contains the analytical data sheets from the CH2M HILL sampling event.

Location and Extent of Contaminated Area – 40 CFR 761.61(a)(3)(i)(C)

Figure 4 shows the remaining PCB concentrations at Building 84 AL#01. Following previous cleanup actions, PCB contamination in the floor of Building 84 remains, with a maximum concentration of 3.77 mg/kg. Four sample locations had PCBs detected at concentrations greater than 1 mg/kg. Two of these four locations are in the northern portion, one is centrally located, and one is near the southern wall of Building 84 (Figure 4).

Cleanup Plan – 40 CFR 761.61(a)(3)(i)(D)

Figure 5 shows the proposed asphalt floor removal areas inside Building 84. Each 10-foot by 10-foot removal area will be centered on the previous sample location with a PCB concentration of greater than 1 mg/kg. The asphalt floor will be removed by saw cutting (approximately 7 cubic yards). Verification samples in the asphalt removal areas will be collected in accordance with 40 CFR Part 761, Subpart O. One verification sample will be collected in the center of each asphalt removal area (Figure 5).

This cleanup action will be performed in accordance with the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003). Sample analysis will be in accordance with the *Quality Assurance Project Plan* (CH2M HILL 2001) using USEPA Method SW8082. Health and safety will be in accordance with the *Health and Safety Plan for PCB Site Sampling and Remediation* (Appendix A in the *Draft Polychlorinated Biphenyl Work Plan* (CH2M HILL 2002)). Standard operating procedures (SOPs) for the field work and issues regarding site security, site access, permits and notifications, site restoration, and site demobilization were addressed in the *Draft Polychlorinated Biphenyl Work Plan* (CH2M HILL 2002).

PCB waste management will be performed in accordance with CH2M HILL SOP Health, Safety, and the Environment Number 82 (HSE-82). This SOP was provided in Appendix B8 of the *Draft Polychlorinated Biphenyl Work Plan* (CH2M HILL 2002). It is assumed based on the initial site characterization results that PCB-containing wastes generated from this cleanup action will be disposed of off site at a Class II landfill.

This additional cleanup action for the Building 84 floor will occur during December 2003 or January 2004. In accordance with 40 CFR 761.61(a)(4), the goal for this self-implementing cleanup is to achieve a remaining PCB concentration of less than or equal to 1 mg/kg for this high-occupancy area, as determined by the verification sampling. Abatement will continue until the verification sampling results indicate that this cleanup goal has been met.

Certification – 40 CFR 761.61(a)(3)(i)(E)

Project files for Building 84 AL#01 are located in the CH2M HILL Office in Oakland, California. This office is located at 155 Grand Avenue, Suite 1000. Attachment B contains the written certification, signed by LMI (the owner of the property where the cleanup site is located) and CH2M HILL (the party conducting the cleanup), documenting that all sampling plans and procedures used to assess or characterize the PCB contamination at the cleanup site are on file at the above-mentioned location and are available for USEPA inspection.

Conclusions

There are four areas in the asphalt floor inside Building 84 where stain-specific sample results had PCB concentrations greater than 1 mg/kg. These four areas will be removed by saw cutting 10-foot by 10-foot areas centered on the original sample locations. Verification sample results will determine whether the cleanup goal of less than or equal to 1 mg/kg has been met.

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Please submit your approval of the self-implementing cleanup option to me within 30 calendar days of receiving this Notification at the above address or via e-mail at jmorris1@CH2M.com. If you have any questions or concerns regarding this Notification for Building 84 AL#01, please contact Carla Duncan at 775/329-7238, extension 220.

References

CH2M HILL. 2001. *Quality Assurance Project Plan*. November.

_____. 2002. *Draft Polychlorinated Biphenyl Work Plan*. August 6.

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Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment (SSPORTS). 1995. *PCB Decontamination Technical Work Document (TWD), PCB Contaminated Spill Site No. Floor Stain-01, TWD No. 95-0070, Bldg No. 84*. March 2.

_____. 1997a. *Interim Polychlorinated Biphenyl (PCB) Assessment for Parcel 08-B7*. July 30.

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_____. 1998b. *PCB Decontamination Technical Work Document (TWD), PCB-Contaminated Site, Asphalt and Dirt Removal Inside Bldg. 84, TWD No. 97-1472 Rev. B, Bldg No. 84*. June 10.

_____. 1999. *Yard Route Slip. Subject: Release of Parcel 08-B7*. August 20.

Tetra Tech Environmental Management, Inc. (TtEMI). 1998. *Final Basewide Polychlorinated Biphenyl Confirmation Sampling Summary Report*. February 13.

United States Environmental Protection Agency, United States Department of the Navy, the City of Vallejo, and Lennar Mare Island. 2001. *Complaint/Consent Agreement and Final Order between Lennar Mare Island, the City of Vallejo, the U.S. Department of the Navy, and the U.S. Environmental Protection Agency Region IX*. EPA Docket No. TSCA-9-2002-0002. December 20.

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Sincerely,

CH2M HILL

A handwritten signature in cursive script, appearing to read "Carla Duncan". Below the signature, the word "for" is written in a smaller, simpler script.

Jeffery C. Morris, PE

RDD/032940086 (CAH2508.doc)

Enclosures: Figures 1 through 5, Table 1, Attachments A and B

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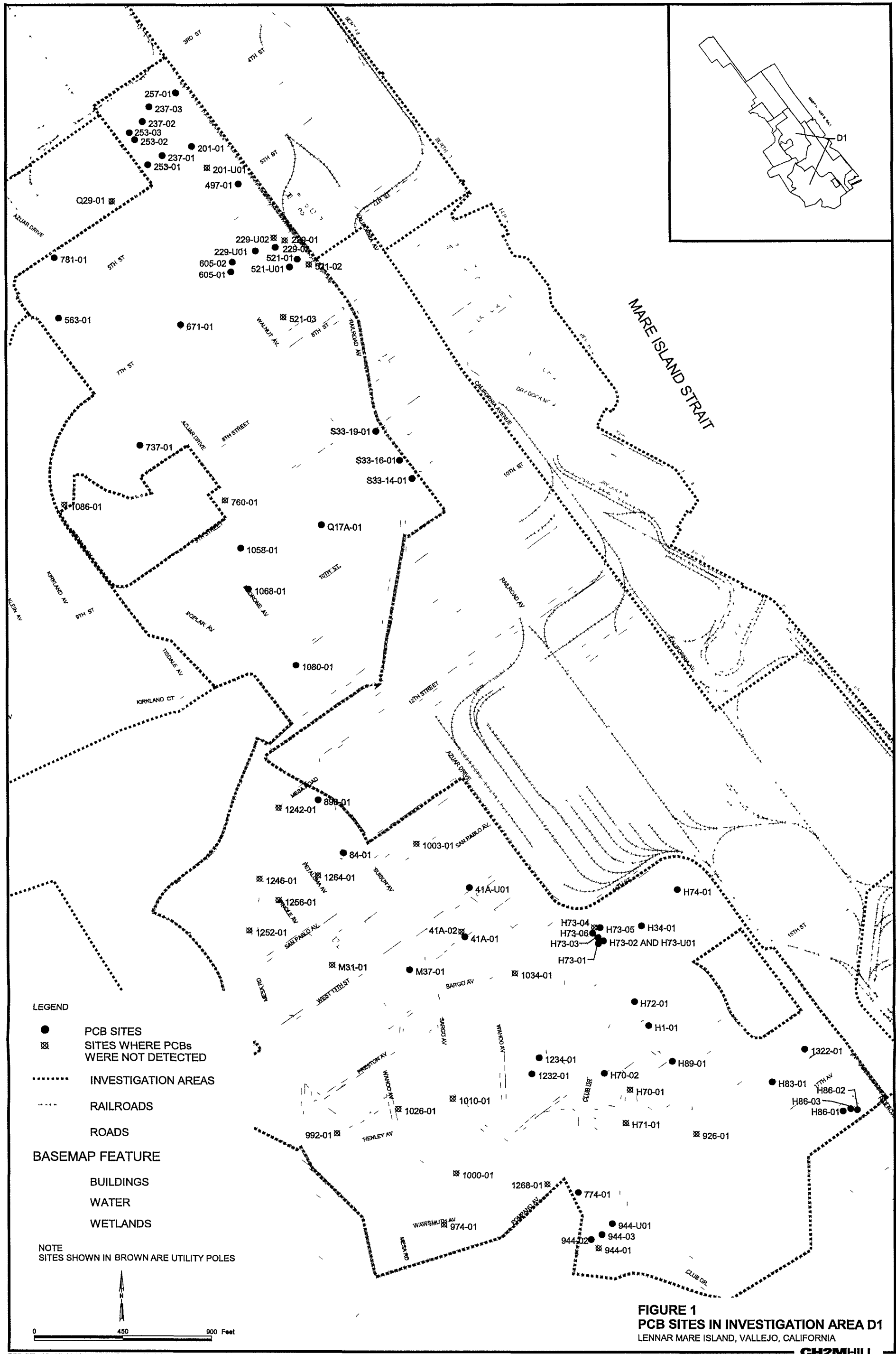
Mr. Albert T. Iliff
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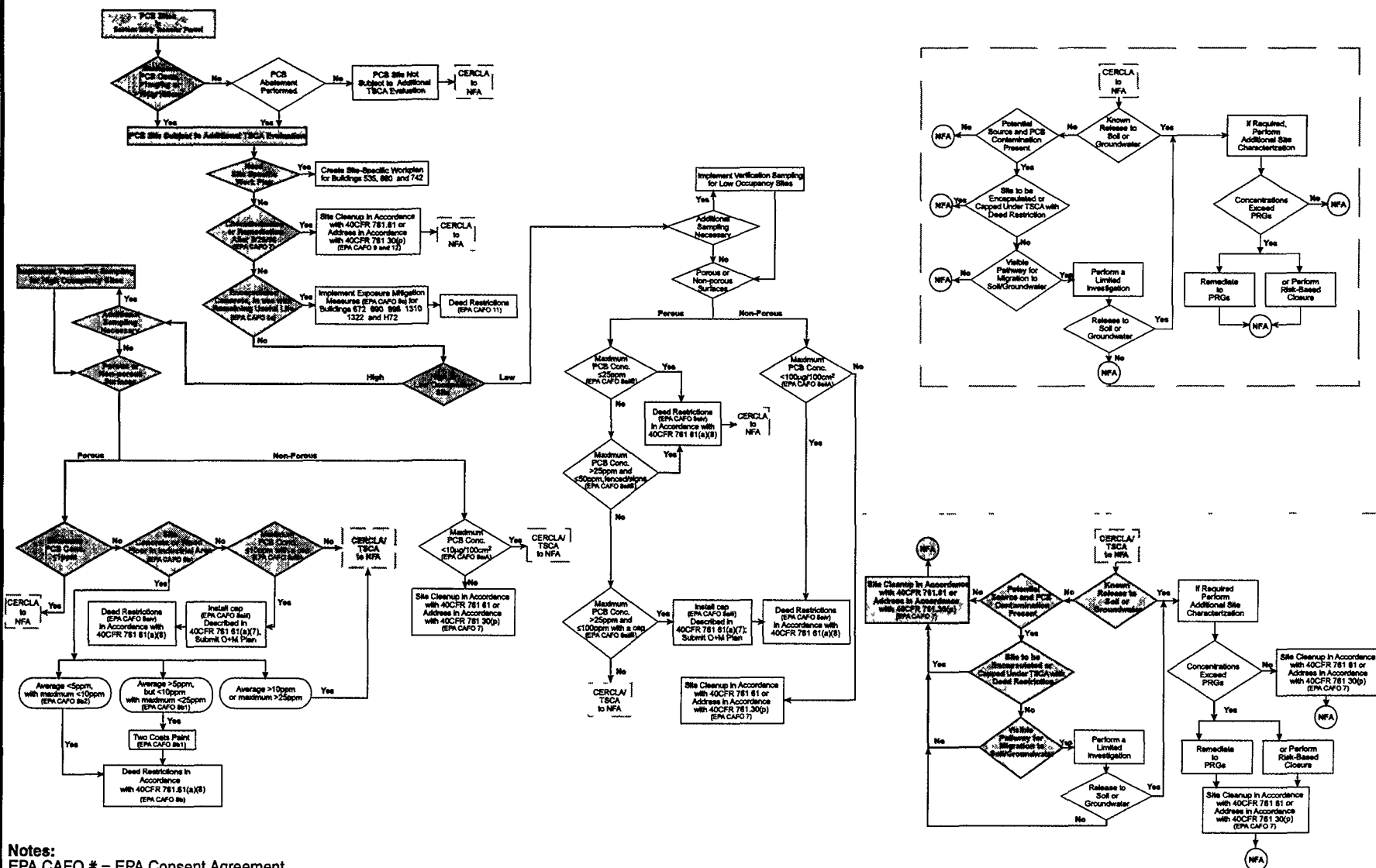
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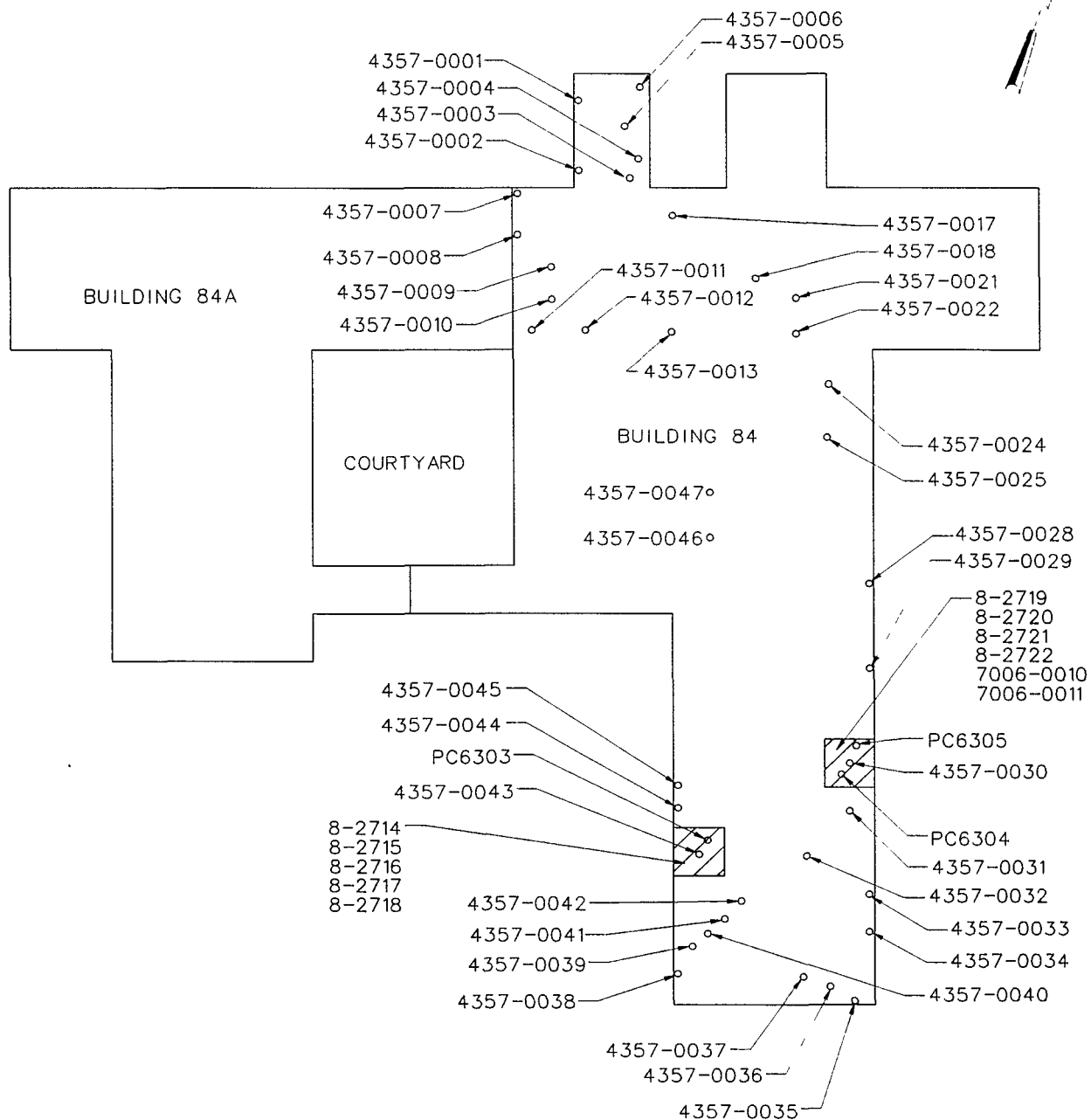
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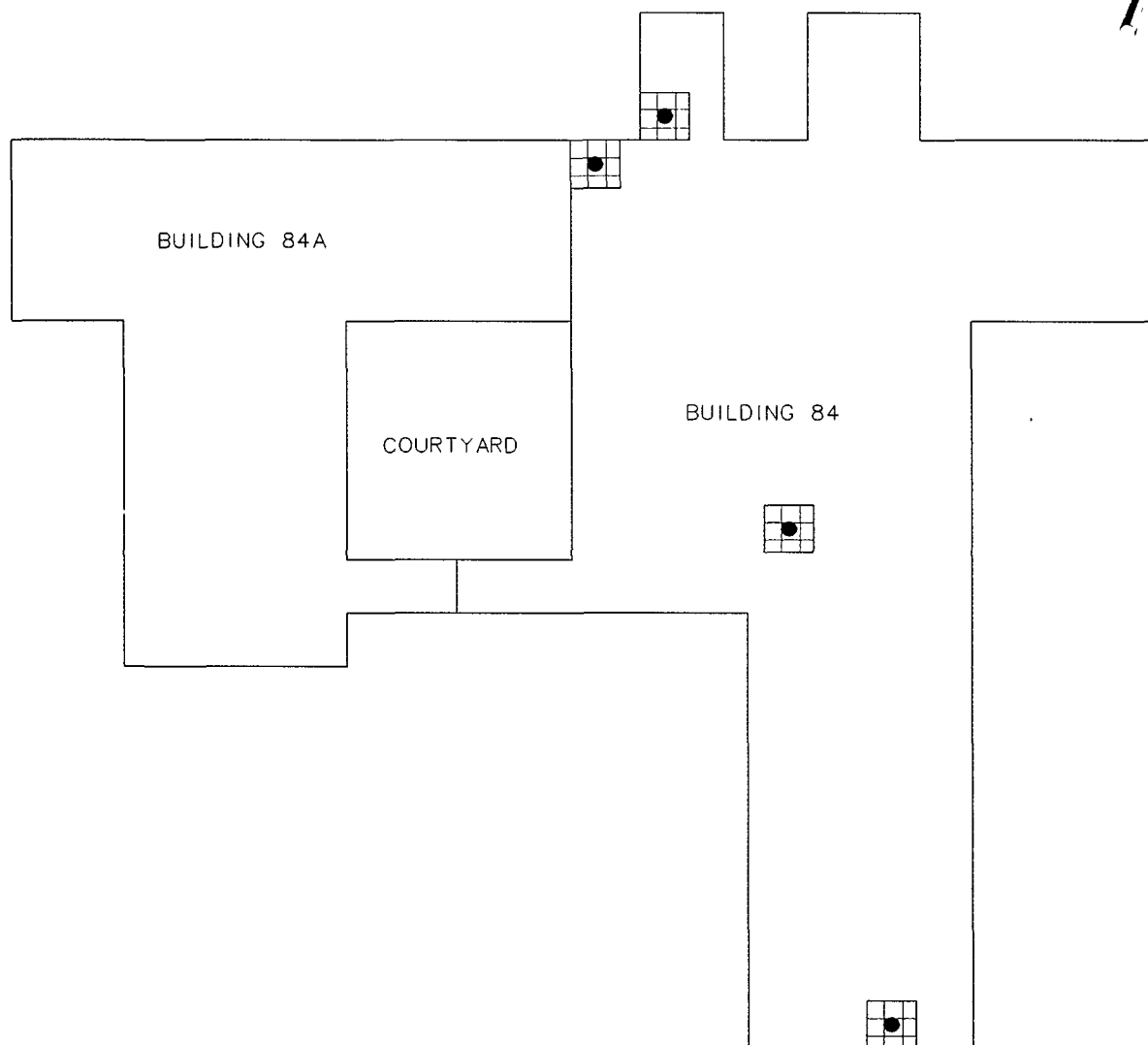
**FIGURE 2
 PATH FOR PCB SITE CLOSURE
 BUILDING 84 AL#01
 LENNAR MARE ISLAND, VALLEJO, CALIFORNIA**
CH2MHILL



EBS Parcel 08-B7

 PREVIOUS CLEANUP ACTION AREAS

FIGURE 3
BUILDING 84 AL#01
PREVIOUS SAMPLE LOCATIONS
LENNAR MARE ISLAND, Vallejo, California



EBS Parcel 08-B7


-  PROPOSED CLEANUP ACTION AREA
- VERIFICATION SAMPLE LOCATION

FIGURE 5
BUILDING 84 AL#01
CLEANUP ACTION AREAS AND
VERIFICATION SAMPLE LOCATIONS
LENNAR MARE ISLAND, Vallejo, California

TABLE 1

Sample Results for Building 84 AL#01

PCB Sites, Lennar Mare Island, Vallejo, California

PCB Site Name	Site Description	Sample Number	Sample Matrix	Sample Date	PCB Concentration (mg/kg)	Comments
Building 84 AL#01	Floor of the building	4357-0001	Asphalt	2/22/95	0.653	
		4357-0002	Asphalt	2/22/95	1.11	
		4357-0007	Asphalt	2/22/95	1.37	
		4357-0008	Asphalt	2/22/95	0.716	
		4357-0030	Concrete	2/22/95	11.3 µg/100 cm ²	Removed
		4357-0037	Asphalt	2/22/95	3.77	
		4357-0043	Concrete	2/22/95	23.5	Removed
		4357-0046	Asphalt	2/22/95	1.17	
		4357-0047	Asphalt	2/22/95	0.113	
		7006-0010	Concrete	1/7/97	8.4	Removed
		7006-0011	Concrete	1/7/97	5.7	Removed
		PC6303	Concrete	12/10/98	0.02 J	
		PC6304	Concrete	12/10/98	ND (< 0.036)	
		PC6305	Concrete	12/10/98	ND (< 0.036)	
		8-2714-CH2M	Soil	6/25/02	ND (< 0.04)	
		8-2715-CH2M	Soil	6/25/02	ND (< 0.04)	
		8-2716-CH2M	Soil	6/25/02	ND (< 0.04)	
		8-2717-CH2M	Soil	6/25/02	ND (< 0.04)	
		8-2718-CH2M	Soil	6/25/02	ND (< 0.04)	
		8-2719-CH2M	Soil	6/25/02	ND (< 0.04)	
		8-2720-CH2M	Soil	6/25/02	ND (< 0.04)	
		8-2721-CH2M	Soil	6/25/02	ND (< 0.04)	

Notes:

Sample numbers beginning with PC were collected by TtEMI. Sample numbers beginning with B were collected by CH2M HILL. All other samples were collected by SSPTS.

The following wipe and/or solid samples were collected from the floor of Building 84 on 2/22/95 and had PCB results <10 µg/100 cm² or <2 mg/kg: 4357-0003 through 0006 (asphalt); 4357-0009 through 0010 (painted asphalt); 4357-0011 (soil); 4357-0012 through 0013 (painted asphalt); 4357-0017 (asphalt); 4357-0018 through 0020 (painted asphalt); 4357-0021 through 0023 (asphalt); 4357-0024 through 0025 (painted asphalt); 4357-0028 (asphalt); 4357-0029 (painted concrete); 4357-0031 through 0036 (painted concrete); 4357-0038 through 0042 (painted concrete); 4357-0044 (painted concrete); 4357-0045 (painted asphalt).

AL Assessment Location.

J estimated concentration.

mg/kg milligrams per kilogram.

ND not detected (laboratory reporting limit in parentheses).

PCB polychlorinated biphenyl.

Attachment A
CH2M HILL Analytical Data
for Building 84 AL#01

1A
ANALYSIS DATA SHEET
PCB

EPA SAMPLE NO.

8-2714-CH2M

Lab Name: CH2M HILL ASL Project No.: 166294.DR.PC
 Lab Code: CVO
 Lab. File ID: C:\HPCHEM\1\DATA\071102H1\046F4901.D
 Matrix: CONCRETE
 Sample Amt: 10.13 g
 % Solid: 82
 Instrument ID: GC-H
 GC Column: DB-1701 0.25um x 30 m x 0.25mm

Lab Batch No.: 7707
 Lab Sample ID: 770701
 Date Sampled: 06/25/02
 Date Extracted: 07/08/02
 Date Analyzed: 07/13/02
 Total Dilution Factor: 1
 Concentration Units: ug/Kg
 Initial Cal ID: PCB062602

CAS	COMPOUND	MDL	RL	RESULT	Q
12674-11-2	PCB-1016	5.33	39.7	39.7	U
11104-28-2	PCB-1221	2.92	39.7	39.7	U
11141-16-5	PCB-1232	2.15	39.7	39.7	U
53469-21-9	PCB-1242	3.66	39.7	39.7	U
12672-29-6	PCB-1248	2.70	39.7	39.7	U
11097-89-1	PCB-1254	2.00	39.7	39.7	U
11096-82-5	PCB-1260	1.73	39.7	39.7	U

SURROGATE:

CAS	COMPOUND	CONTROL LIMITS	%REC	Q
2051-24-3	Decachlorobiphenyl	25-143%	112	

Comments:

007

1A
ANALYSIS DATA SHEET
PCB

EPA SAMPLE NO.

8-2715-CH2M

Lab Name: CH2M HILL ASL

Project No.: 166294.DR.PC

Lab Code: CVO

Lab Batch No.: 7707

Lab. File ID: C:\HPCHEM\1\DATA\071102H1\047F5001.D

Lab Sample ID: 770702

Matrix: CONCRETE

Date Sampled: 06/25/02

Sample Amt: 10.59 g

Date Extracted: 07/08/02

% Solid: 84

Date Analyzed: 07/13/02

Instrument ID: GC-H

Total Dilution Factor: 1

GC Column: DB-1701 0.25um x 30 m x 0.25mm

Concentration Units: ug/Kg

Initial Cal ID: PCB062602

CAS	COMPOUND	MDL	RL	RESULT	Q
12674-11-2	PCB-1016	4.98	37.1	37.1	U
11104-28-2	PCB-1221	2.73	37.1	37.1	U
11141-16-5	PCB-1232	2.01	37.1	37.1	U
53469-21-9	PCB-1242	3.42	37.1	37.1	U
12672-29-6	PCB-1248	2.52	37.1	37.1	U
11097-69-1	PCB-1254	1.86	37.1	37.1	U
11096-82-5	PCB-1260	1.61	37.1	37.1	U

SURROGATE:

CAS	COMPOUND	CONTROL LIMITS	%REC	Q
2051-24-3	Decachlorobiphenyl	25-143%	97	

Comments:

008

1A
ANALYSIS DATA SHEET
PCB

EPA SAMPLE NO.

8-2716-CH2M

Lab Name: CH2M HILL ASL Project No.: 166294.DR.PC
Lab Code: CVO
Lab. File ID: C:\HPCHEM\1\DATA\071102H1\048F5101.D
Matrix: CONCRETE
Sample Amt: 10.28 g
% Solid: 84
Instrument ID: GC-H
GC Column: DB-1701 0.25um x 30 m x 0.25mm

Lab Batch No.: 7707
Lab Sample ID: 770703
Date Sampled: 06/25/02
Date Extracted: 07/08/02
Date Analyzed: 07/13/02
Total Dilution Factor: 1
Concentration Units: ug/Kg
Initial Cal ID: PCB062602

CAS	COMPOUND	MDL	RL	RESULT	Q
12674-11-2	PCB-1016	5.13	38.2	38.2	U
11104-28-2	PCB-1221	2.81	38.2	38.2	U
11141-16-5	PCB-1232	2.07	38.2	38.2	U
53469-21-9	PCB-1242	3.52	38.2	38.2	U
12672-29-6	PCB-1248	2.60	38.2	38.2	U
11097-69-1	PCB-1254	1.92	38.2	38.2	U
11096-82-5	PCB-1260	1.66	38.2	38.2	U

SURROGATE:

CAS	COMPOUND	CONTROL LIMITS	%REC	Q
2051-24-3	Decachlorobiphenyl	25-143%	109	

Comments:

009

1A
ANALYSIS DATA SHEET
PCB

EPA SAMPLE NO.

8-2717-CH2M

Lab Name: CH2M HILL ASL

Project No.: 166294.DR.PC

Lab Code: CVO

Lab Batch No.: 7707

Lab. File ID: C:\HPCHEM\1\DATA\071302H1\033F3401.D

Lab Sample ID: 770704

Matrix: CONCRETE

Date Sampled: 06/25/02

Sample Amt: 10.25 g

Date Extracted: 07/08/02

% Solid: 86

Date Analyzed: 07/14/02

Instrument ID: GC-H

Total Dilution Factor: 1

GC Column: DB-1701 0.25um x 30 m x 0.25mm

Concentration Units: ug/Kg

Initial Cal ID: PCB062602

CAS	COMPOUND	MDL	RL	RESULT	Q
12674-11-2	PCB-1016	5.02	37.4	37.4	U
11104-28-2	PCB-1221	2.75	37.4	37.4	U
11141-16-5	PCB-1232	2.03	37.4	37.4	U
53469-21-9	PCB-1242	3.45	37.4	37.4	U
12672-29-6	PCB-1248	2.54	37.4	37.4	U
11097-69-1	PCB-1254	1.88	37.4	37.4	U
11096-82-5	PCB-1260	1.63	37.4	37.4	U

SURROGATE:

CAS	COMPOUND	CONTROL LIMITS	%REC	Q
2051-24-3	Decachlorobiphenyl	25-143%	104	

Comments:

010

1A
ANALYSIS DATA SHEET
PCB

EPA SAMPLE NO

8-2718-CH2M

Lab Name: CH2M HILL ASL Project No.: 166294.DR.PC
 Lab Code: CVO
 Lab. File ID: C:\HPCHEM\1\DATA\071302H1\034F3501.D
 Matrix: CONCRETE
 Sample Amt: 10.39 g
 % Solid: 84
 Instrument ID: GC-H
 GC Column: DB-1701 0.25um x 30 m x 0.25mm

Lab Batch No.: 7707
 Lab Sample ID: 770705
 Date Sampled: 06/25/02
 Date Extracted: 07/08/02
 Date Analyzed: 07/14/02
 Total Dilution Factor: 1
 Concentration Units: ug/Kg
 Initial Cal ID: PCB062602

CAS	COMPOUND	MDL	RL	RESULT	Q
12674-11-2	PCB-1016	5.07	37.8	37.8	U
11104-28-2	PCB-1221	2.78	37.8	37.8	U
11141-16-5	PCB-1232	2.05	37.8	37.8	U
53469-21-9	PCB-1242	3.49	37.8	37.8	U
12672-29-6	PCB-1248	2.57	37.8	37.8	U
11097-69-1	PCB-1254	1.90	37.8	37.8	U
11096-82-5	PCB-1260	1.64	37.8	37.8	U

SURROGATE:

CAS	COMPOUND	CONTROL LIMITS	%REC	Q
2051-24-3	Decachlorobiphenyl	25-143%	96	

Comments:

011

1A
ANALYSIS DATA SHEET
PCB

EPA SAMPLE NO.

8-2719-CH2M

Lab Name: CH2M HILL ASL Project No.: 166294.DR.PC
 Lab Code: CVO
 Lab. File ID: C:\HPCHEM\1\DATA\071302H1\035F3601.D
 Matrix: CONCRETE
 Sample Amt: 10.48 g
 % Solid: 86
 Instrument ID: GC-H
 GC Column: DB-1701 0.25um x 30 m x 0.25mm

Lab Batch No.: 7707
 Lab Sample ID: 770706
 Date Sampled: 06/25/02
 Date Extracted: 07/08/02
 Date Analyzed: 07/14/02
 Total Dilution Factor: 1
 Concentration Units: ug/Kg
 Initial Cal ID: PCB062602

CAS	COMPOUND	MDL	RL	RESULT	Q
12674-11-2	PCB-1016	4.91	36.6	36.6	U
11104-28-2	PCB-1221	2.69	36.6	36.6	U
11141-16-5	PCB-1232	1.98	36.6	36.6	U
53469-21-9	PCB-1242	3.38	36.6	36.6	U
12672-29-6	PCB-1248	2.49	36.6	36.6	U
11097-69-1	PCB-1254	1.84	36.6	36.6	U
11096-82-5	PCB-1260	1.59	36.6	36.6	U

SURROGATE:

CAS	COMPOUND	CONTROL LIMITS	%REC	Q
2051-24-3	Decachlorobiphenyl	25-143%	109	

Comments:

012

1A
ANALYSIS DATA SHEET
PCB

EPA SAMPLE NO

8-2720-CH2M

Lab Name: CH2M HILL ASL

Project No.: 166294.DR.PC

Lab Code: CVO

Lab Batch No.: 7707

Lab. File ID: C:\HPCHEM\1\DATA\071302H1\038F3901.D

Lab Sample ID: 770709

Matrix: CONCRETE

Date Sampled: 06/25/02

Sample Amt: 10.41 g

Date Extracted: 07/08/02

% Solid: 85

Date Analyzed: 07/14/02

Instrument ID: GC-H

Total Dilution Factor: 1

GC Column: DB-1701 0.25um x 30 m x 0.25mm

Concentration Units: ug/Kg

Initial Cal ID: PCB062602

CAS	COMPOUND	MDL	RL	RESULT	Q
12674-11-2	PCB-1016	5.01	37.3	37.3	U
11104-28-2	PCB-1221	2.74	37.3	37.3	U
11141-16-5	PCB-1232	2.02	37.3	37.3	U
53469-21-9	PCB-1242	3.44	37.3	37.3	U
12672-29-6	PCB-1248	2.53	37.3	37.3	U
11097-69-1	PCB-1254	1.87	37.3	37.3	U
11096-82-5	PCB-1260	1.62	37.3	37.3	U

SURROGATE:

CAS	COMPOUND	CONTROL LIMITS	%REC	Q
2051-24-3	Decachlorobiphenyl	25-143%	115	

Comments:

015

1A
ANALYSIS DATA SHEET
PCB

EPA SAMPLE NO.

8-2721-CH2M

Lab Name: CH2M HILL ASL

Project No.: 166294.DR.PC

Lab Code: CVO

Lab Batch No.: 7707

Lab. File ID: C:\HPCHEM\1\DATA\071302H1\039F4001.D

Lab Sample ID: 770710

Matrix: CONCRETE

Date Sampled: 06/25/02

Sample Amt 10.09 g

Date Extracted: 07/08/02

% Solid: 83

Date Analyzed: 07/14/02

Instrument ID: GC-H

Total Dilution Factor: 1

GC Column: DB-1701 0.25um x 30 m x 0.25mm

Concentration Units: ug/Kg

Initial Cal ID: PCB062802

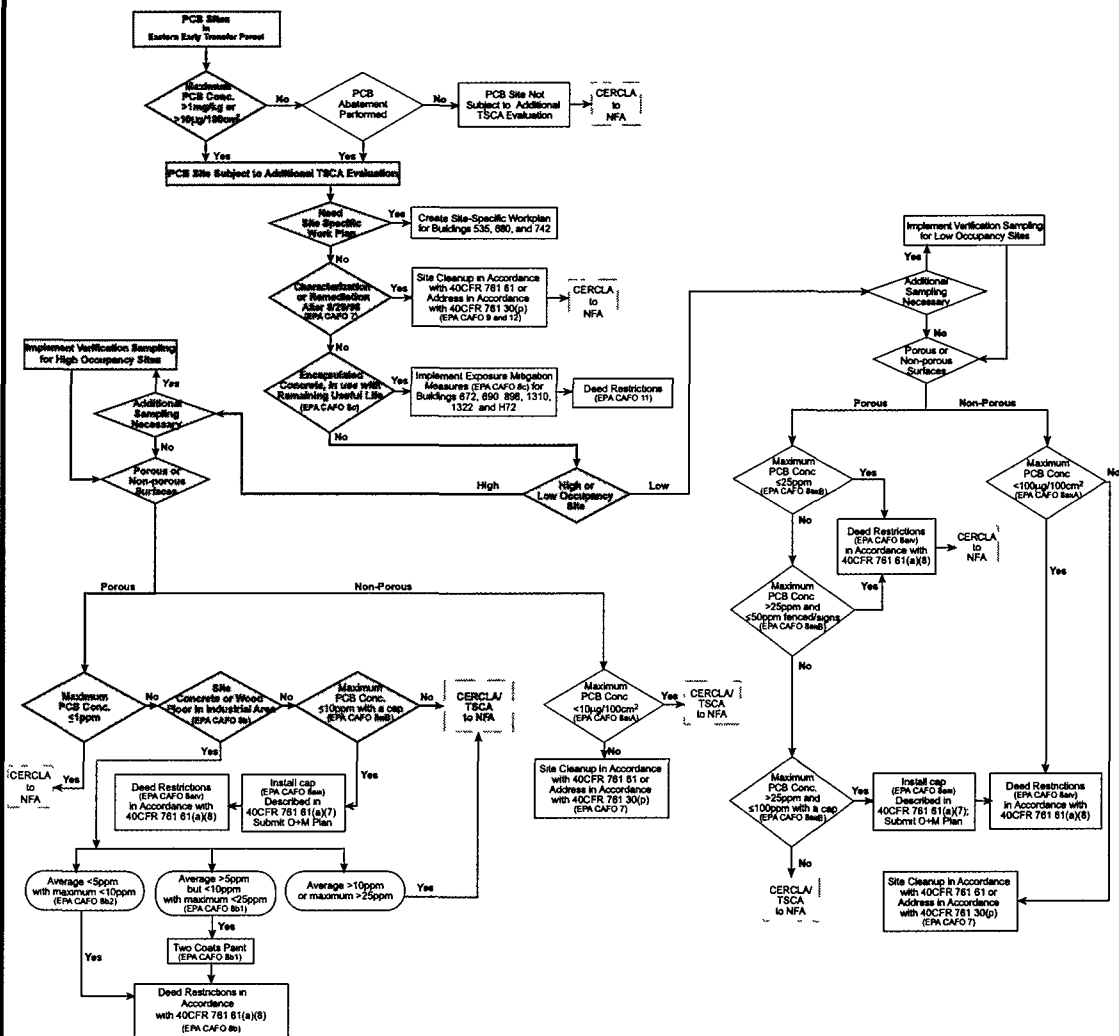
CAS	COMPOUND	MDL	RL	RESULT	Q
12674-11-2	PCB-1016	5.29	39.4	39.4	U
11104-28-2	PCB-1221	2.90	39.4	39.4	U
11141-16-5	PCB-1232	2.14	39.4	39.4	U
53469-21-9	PCB-1242	3.63	39.4	39.4	U
12672-29-6	PCB-1248	2.68	39.4	39.4	U
11097-69-1	PCB-1254	1.98	39.4	39.4	U
11096-82-5	PCB-1260	1.71	39.4	39.4	U

SURROGATE:

CAS	COMPOUND	CONTROL LIMITS	%REC	Q
2051-24-3	Decachlorobiphenyl	25-143%	109	

Comments:

016



Notes:
EPA CAFO # = EPA Consent Agreement
and Final Order paragraph number.

NFA = No further action.

O+M = Operations and Maintenance.

PRG = Preliminary Remediation Goal.

E022003011RDD_142 (10/21/03)

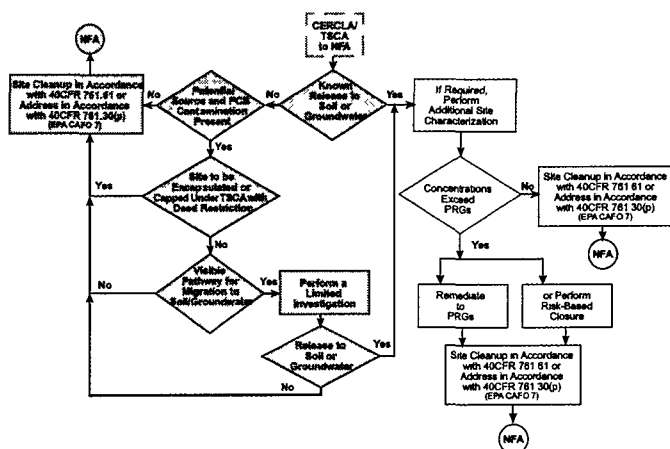
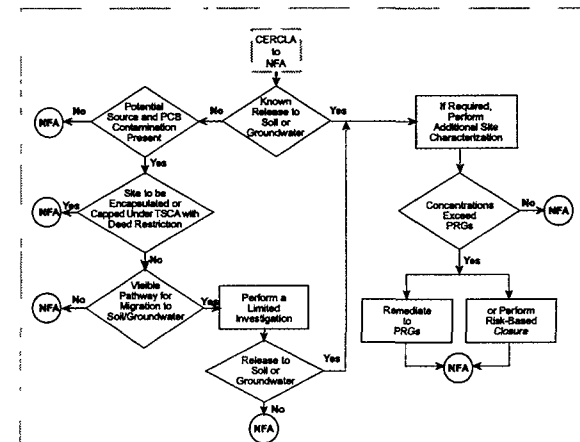


FIGURE 2
PATH FOR PCB SITE CLOSURE
BUILDING 84 AL#01
LENNAR MARE ISLAND, VALLEJO, CALIFORNIA
CH2MHILL

Attachment B
Certification

ATTACHMENT B

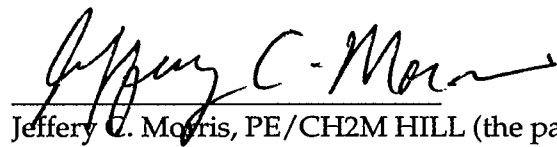
Certification

All sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the polychlorinated biphenyl (PCB) contamination at Building 84 AL#01 are on file at the CH2M HILL Office located at 155 Grand Avenue, Suite 1000, Oakland, California. These files are available for USEPA inspection.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.



Tom Sheaff, Lennar Mare Island (the owner of the property where the cleanup site is located)



Jeffery C. Morris, PE/CH2M HILL (the party conducting the cleanup)